

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN HER
CAPACITY AS THE COMMISSIONER OF
EDUCATION OF THE STATE OF NEW
YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

**DECLARATION OF COREY A. CALABRESE IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Corey A. Calabrese, declare as follows:

1. I am an associate of Latham & Watkins LLP, 885 Third Avenue, New York, NY 10022, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.

2. I respectfully submit this declaration in support of Plaintiffs' motion for attorneys' fees and costs. I have personal knowledge of the facts and circumstances set forth herein.

3. Attached as **Exhibit A** is a true and correct copy of the transcript of a meeting of the New York State Board of Regents, dated November 17, 2014, and admitted at trial as PX213.

4. Attached as **Exhibit B** is a true and correct copy of a letter from Plaintiffs' counsel to Mr. Yehuda Weissmandl, former President of the Board of Education of the East Ramapo Central School District (the "District"), dated October 2, 2017.

5. Attached as **Exhibit C** is a true and correct copy of Plaintiffs' response to the District's First Set of Requests for Production, dated February 2, 2018.

6. Attached as **Exhibit D** is a true and correct copy of the transcript of proceedings held before the Court on January 2, 2018.

7. Attached as **Exhibit E** is a true and correct copy of the transcript of proceedings held before the Court on April 13, 2018.

8. Attached as **Exhibit F** is a true and correct copy of excerpts from Plaintiffs' video clips of depositions, admitted at trial as PX339.

9. Attached as **Exhibit G** is a true and correct copy of the transcript of proceedings held before Magistrate Judge McCarthy on November 9, 2018.

10. Attached as **Exhibit H** is a true and correct copy of student enrollment data compiled by the New York State Education Department, admitted at trial as PX372.

11. Attached as **Exhibit I** is a true and correct copy of an email chain exchanged between Plaintiffs' counsel and the District's counsel, dated between February 25, 2020 and February 26, 2020.

12. Attached as **Exhibit J** is a true and correct copy of the minutes of a meeting of the District's Board of Education, dated November 21, 2017, admitted at trial as PX292.

13. Attached as **Exhibit K** is a true and correct copy of an email chain exchanged between Plaintiffs' counsel and the District's counsel, dated between May 27, 2020 and June 21, 2020.

14. Attached as **Exhibit L** is a true and correct copy of the minutes of a meeting of the Audit Committee of the District's Board of Education, dated July 24, 2012, and admitted at trial as PX197.

15. Attached as **Exhibit M** is a true and correct copy of the minutes of a meeting of the District's Board of Education, dated December 18, 2012.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 25, 2020

Respectfully submitted,

/s/ Corey A. Calabrese
Corey A. Calabrese